



May 2, 2012

**TROY CORPORATION**

Via FEDEX

Document Processing Desk (DCI/AD)  
Attention: Re-evaluation Team Leader, PM36  
U.S. EPA (7510P)  
One Potomac Yard (South Building)  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Generic DCI 90 Day Response  
Case # 0044-10,10'Oxybisphenoxyarsine  
Chemical # 012601

Dear Ms. Von Dem Hagen:

Enclosed please find Troy Chemical Corporation Generic DCI 90 Day response for the chemical 10, 10'Oxybisphenoxyarsine. As part of this response we enclose the following documents:

- Data Call-In Response Form
- Requirements Status and Registrant's Response Form
- EPA Form 8570-32 Certification of Attempt to Enter into An Agreement with Registrants for Development of Data and associated letter from Winpeace International Ltd. Note that in follow up telephone conversations with the registered agent for Winpeace International Mr. M.H. Goose no formal decision was made to enter into an official data development sharing agreement. Further instruction from the Taiwan office was necessary. Attempts to contact both Dow Chemical and Akcros Chemicals Inc. resulted in their informing us of their intent to cancel their registrations.
- Confidential Statements of Formula (CSF) for the following products:
  - EPA Reg. No. 5383-124
  - EPA Reg. No. 5383-125
  - EPA Reg. No. 5383-126
  - EPA Reg. No. 5383-129
  - EPA Reg. No. 5383-130

Ms. Von Dem Hagen please contact me should you have any additional questions concerning our response. I can be reached by phone or email (973-443-4200, X2249 or [krygsmaa@troycorp.com](mailto:krygsmaa@troycorp.com)).

Sincerely,

Adrian Krygsman  
Director, Product Registration  
Cc: DF/DS

United States Environmental Protection Agency  
Washington, D.C. 20460  
**DATA CALL-IN RESPONSE**

CMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

|  |   |   |  |  |  |
|--|---|---|--|--|--|
| 1. Company Name and Address<br>TROY CHEMICAL CORP<br>8 VREELAND ROAD, P.O. Box 955<br>FLORHAM PARK, NJ 079324200   |   | 2. Case # and Name<br>0044 - 10,10'-Oxybisphenoxarsine<br>Chemical # and Name: 012601<br>10,10'-Oxybisphenoxarsine                      |  | 3. Date and Type of DCI and Number<br>24-Jan-2012<br>GENERIC<br>ID # GDCI-012601-1094  |  |
| 4. EPA Product Registration  | 5. I wish to cancel this product registration voluntarily | 6. Generic Data   |  | 7. Product Specific Data   |  |
|  |   | 6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below. | 6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response." | 7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response." | 7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response." |
| 5383-124   |   | 5383-124  | ✓ yes  | N/A  | N/A  |
| 5383-125   |   | 5383-124  |  | N/A  | N/A  |
| 5383-126   |   | 5383-124  |  | N/A  | N/A  |
| 5383-129   |   | 5383-124  |  | N/A  | N/A  |
| 5383-130   |   | 5383-124  |  | N/A  | N/A  |
| 8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. |   |   |  | 9. Date  |  |
| Signature and Title of Company's Authorized Representative <i>Adrian Ruggen</i> DIRECTOR, PRODUCT REG.   |   |   |  | 4/27/2012  |  |
| 10. Name of Company TROY CORPORATION for TROY CHEMICAL CORP.   |   |   |  | 11. Phone Number 973-443-4200  |  |

United States Environmental Protection Agency  
Washington, D.C. 20460

C.M.E. Approval 2070-0174

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

| 1. Company Name and Address<br>TROY CHEMICAL CORP<br>8 VREELAND ROAD, P.O. Box 955<br>FLORHAM PARK, NJ 079324200  |   | 2. Case # and Name<br>0044 - 10,10'-Oxybisphenoxarsine<br>Chemical # and Name: 012601<br>10,10'-Oxybisphenoxarsine |                  |   | 3. Date and Type of DCl and Number<br>24-Jan-2012<br>GENERIC<br>ID # GDCl-012601-1094 |                |   |                        |                        |
|---|---|--|------------------|---|---|----------------|---|------------------------|------------------------|
| 4. Guideline Requirement Number   | 5. Study Title  | P<br>R<br>O<br>T<br>O<br>C<br>O<br>L   | Progress Reports |   |   | 6. Use Pattern | 7. Test Substance                           | 8. Time Frame (Months) | 9. Registrant Response |
|   |   |  | 1                | 2 | 3   |                |   |                        |                        |
| <b>Applicator Exposure Data Requirements (Conventional Chemical)</b>  |   |  |                  |   |   |                |   |                        |                        |
| 875.1200  | Dermal exposure--Indoor   | N  |                  |   |   | X              | TEP   | 24                     | 9                      |
| 875.1400  | Inhalation exposure--indoor                                     | N  |                  |   |   | X              | TEP   | 24                     | 9                      |
| 875.1600  | Application exposure monitoring data reporting (3)              | N  |                  |   |   | X              | TEP   | 24                     | 9                      |
| 875.1700  | Product Use Information   | N  |                  |   |   | X              | TEP   | 8                      | 1                      |
| <b>Environmental Fate Data Requirements (Conventional Chemical)</b>   |   |  |                  |   |   |                |   |                        |                        |
| 835.2120  | Hydrolysis of parent and degradates as a function of pH at 25 C | N  |                  |   |   | X              | PAIRA; TGAI                                 | 12                     | 1                      |
| 835.2240  | Direct photolysis rate of parent and degradates in water        | N  |                  |   |   | X              | PAIRA; TGAI                                 | 12                     | 1                      |
| <b>Nontarget Plant Protection Data Requirements (Conventional Chemical)</b>   |   |  |                  |   |   |                |   |                        |                        |
| 850.5400  | Algal toxicity, Tiers 1 and II                                  | N  |                  |   |   | X              | TEP; TGAI                                   | 12                     | 1                      |
| 10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. |   |  |                  |   |   |                | 11. Date<br>4/30/2012                       |                        |                        |
| Signature and Title of Company's Authorized Representative <u>Adrian Krzyzanski Director</u>  |   |  |                  |   |   |                |   |                        |                        |
| 12. Name of Company <u>TROY CHEMICAL CORPORATION</u>  |   |  |                  |   |   |                | 13. Phone Number <u>973-443-4200, X2249</u> |                        |                        |



United States Environmental Protection Agency  
Washington, D.C. 20460

OM3 Approval 2070-0174

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary

| 1. Company Name and Address<br><br>TROY CHEMICAL CORP<br>8 VREELAND ROAD, P.O. Box 955<br>FLORHAM PARK, NJ 079324200 |  | 2. Case # and Name<br><br>0044 - 10,10'-Oxybisphenoxarsine<br>Chemical # and Name: 012601<br>10,10'-Oxybisphenoxarsine |                  |   | 3. Date and Type of DCL and Number<br><br>24-Jan-2012<br>GENERIC<br>ID # GDCI-012601-1094 |                |                   |                        |                        |
|--|--|--|------------------|---|---|----------------|-------------------|------------------------|------------------------|
| 4. Guideline Requirement Number  | 5. Study Title   | P<br>R<br>O<br>T<br>O<br>C<br>O<br>L   | Progress Reports |   |   | 6. Use Pattern | 7. Test Substance | 8. Time Frame (Months) | 9. Registrant Response |
|  |  |  | 1                | 2 | 3   |                |                   |                        |                        |
| 835.1110   | Activated sludge sorption isotherm                                 | N  |                  |   |   | X              | TGAI              | 12                     | /                      |
| 835.3110   | Ready biodegradability   | N  |                  |   |   | X              | TGAI              | 12                     | /                      |
| 850.6800   | Modified Activated Sludge Respiration Inhibition                   | N  |                  |   |   | X              | TGAI              | 12                     | /                      |
| SS-1125  | Leaching from Pool Liners, Vinyl Flooring, and Mattress Covers (2) | Y  |                  |   |   | X              | EP; TGAI          | 24                     | /                      |
| <p>UNITED STATES ENVIRONMENTAL PROTECTION AGENCY<br/>WASHINGTON, D.C. 20460</p>                                      |  |  |                  |   |   |                |                   |                        |                        |

Attachment to Requirements Status and Registrant's Response Form  
Case # 0044- 10,10' Oxybisphenoxarsine  
Chemical # and Name: 012601

| <b>Guideline Requirement Number</b> | <b>Study Title</b>                             | <b>Registrants Response</b>   |
|-------------------------------------|--|---|
| 875.1200                            | Dermal Exposure-Indoor                         | Troy Chemical is an active member of the American Chemistry Council (ACC) Antimicrobial Exposure Assessment Task Force II and will address this requirement through the development of data through this program. |
| 875.1400                            | Inhalation Exposure-Indoor                     | Troy Chemical is an active member of the American Chemistry Council (ACC) Antimicrobial Exposure Assessment Task Force II and will address this requirement through the development of data through this program. |
| 875.1600                            | Application Exposure Monitoring Data Reporting | Troy Chemical is an active member of the American Chemistry Council (ACC) Antimicrobial Exposure Assessment Task Force II and will address this requirement through the development of data through this program. |



United States Environmental Protection Agency  
Washington, D.C. 20460  
CERTIFICATION OF ATTEMPT TO ENTER INTO AN  
AGREEMENT WITH REGISTRANTS FOR  
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;  
2070-0107; 2070-0122;  
2070-0164

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

Troy Chemical Corporation

Company Number

5383

Chemical Name

10, 10'-Oxybisphenoxarsine

EPA Chemical Number

012601

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

Winpeace International Ltd.

Date of Offer

February 26, 2012

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Date

05/01/2012

Name and Title (Please Print or Type)

Adrian Krygman, Director, Product Registration



February 26, 2012

M. H. Goose, Jr.  
Registered Agent for Winpeace International, LTD  
3414 Bishop Street  
Cincinnati, OH 45220-1831  
(513) 476-9421  
WinpeaceUSA@fuse.net

Biocide Manager - OBPA  
Troy Chemical Corp  
8 Vreeland Road  
PO Box 955  
Florham Park, NJ 07932-4200

RE: US EPA Generic Data Call-In Notice dated January 24, 2012 regarding OBPA

Dear Sir or Madam,

Winpeace International, LTD proposes entering into an agreement to share the cost associated with the generation of the data requested by the US EPA.

It is in the best interest of our companies to share the data and cost of the testing outlined in the Notice. We believe an equitable agreement for sharing the cost would be based on the market share of our respective companies.

Please contact me at your earliest convenience to pursue a mutually agreeable method to share the cost.

Sincerely,

Buddy Goose  
Registered Agent

red: 3/2/2012